

Lindsay Ringer - Fwd: Proposed Staff Ag Order (Ag Order Email Received)

From: AgOrder
To: Steve Saiz
Date: 12/30/2010 2:37 PM
Subject: Fwd: Proposed Staff Ag Order (Ag Order Email Received)
CC: Lindsay Ringer
Attachments: Proposed Staff Ag Order

I would like to comment on the Proposed Staff Ag Order. While the goal of protecting our valuable water resources is certainly appropriate, implementing a blanket "one size fits all" program is not. After reading through the proposed order, it appears the assumption is that all covered ag operations are large scale.

Our own operation consists of a 7 acre vineyard that is sustainably farmed utilizing drip irrigation. The irrigation practices utilize a controlled deficit program, wherein we provide less water to the vines throughout the irrigation season than they actually use. We do this by monitoring the water status in the soil, and start irrigation only after the soil moisture drops to the point that irrigation is required. We then monitor the daily evapotranspiration for the vines utilizing on site sensors and then irrigate to a reduced percentage of their actual water use.

Our vine nutrition status is monitored and needed nutrition is provided by green manure from our cover crop being reincorporated in the soil. Additional fertilizer is not applied. We also do not use chlorpyrifos or diazinon. We utilize minimal rates of pesticides, and extend our application intervals for fungicide utilizing the "Gubler Index" which typically allows for one to two fewer applications throughout the year. Careful attention is paid to sprayer calibration and environmental conditions to minimize possibility of drift or over application of materials.

Since developing the vineyard in 1998 there has been no off site storm runoff, including during the recent December rains. Even if there were to be runoff, there should be no residual chemical materials since all applications of pesticides occur during the dry growing season. Also, since we maintain a cover crop in and adjacent to the vineyard, that vegetation would act as a buffer/filter to contain any sediment that might be in the runoff.

In our case the requirement to monitor and test our well water would not provide any meaningful information on the source of possible contaminants. Our well is adjacent to our property line, and the adjoining properties are not covered by the Proposed Staff Order since they are not using irrigation for crops. The order does not include horse or other livestock operations as a possible source of groundwater contamination and the fact the water within aquifers travels laterally. In our case the property immediately adjacent to our well is a commercial horse boarding operation that disposes of the horse waste onsite. There are also several other high density horse operations nearby that do little to keep their corrals clean of waste.

Even though our vineyard should qualify as Tier 1 the small size of our total operation makes it hard to justify the additional costs of testing and reporting requirements utilizing a cost/benefit analysis. Even if the well tests indicated a problem with the sample, there is no way of determining the source of the contamination due to our small surface size and the water movement throughout the underlying aquifer. The additional costs for complying with the Proposed Staff Ag Order will certainly not help with our vineyard's economic sustainability and not do anything meaningful to help preserve or improve the local water quality. As I mentioned above, water quality protection is certainly appropriate, but the Proposed Staff Ag Order should be more focused to the individual situation of covered properties.

Sincerely,

John Jones,
 Faith Vineyard
 Los Olivos